

Umetco Minerals Corporation

KGH

TJ Vignone



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March 25, 1986

Mr. Robert F. Kelly, Senior Radiologist
Occupational Safety & Health
State of New York - Department of Labor
65 Court Street
Buffalo, NY 14202

Subject Termination of Radioactive Materials License 950-0139

Dear Mr Kelly:

On March 20, when you obtained soil samples to verify the cleanup of the property behind Building 166 on Elkem leased property, I informed you that we had discovered additional areas within the Niagara Plant that had above background radiation. The purpose of this letter is to document our conversation and to make certain that we take the steps necessary for the termination of License No 950-0139.

An environmental audit of the Niagara Plant was scheduled in conjunction with the leverage buy out of Umetco's vanadium and tungsten businesses. In preparation for this, Al Gonas and I completed a gamma survey of the various buildings and grounds on the Niagara site. We found four areas with radiation significantly above background. In addition, the radioactivity of a number of samples stored in quart sized cans was confirmed.

The location of the radioactivity and the levels of radiation observed are shown in Table I.

TABLE I

AREAS IN NIAGARA PLANT SIGNIFICANTLY ABOVE BACKGROUND

<u>Date Surveyed</u>	<u>Location</u>	<u>Background</u>	<u>Maximum Reading</u>	<u>Times Background</u>
2/12/86	Bldg 29 (#6 Fce Rm) - I-beam south of 30 Fce - Trunion support north of 30 Fce	5-10 μ R/hr	200 μ R/hr 420 μ R/hr	20 42
2/18/86	Bldg. 24 (V-A1) - Area below dust collector	8-13 μ R/hr	170 μ R/hr.	15
2/20/86	Yard East of #6 Fce. Rm - 6' x 6' Areas near slag pile	8-12 μ R/hr	200 μ R/hr	20
2/20/86	Yard East of #6 Fce Rm - 2' x 2' area near Bldg 191		210 μ R/hr	20

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The surveys were completed with a Ludlum Model 19 Micro R Meter calibrated on September 26, 1984. (Accuracy checked by comparison with an alpha, beta, gamma meter - Nuclear Chicago Model 2650 - March 21, 1986).

The dates the buildings of the Niagara Plant were surveyed and the background radiation observed are contained in Table II. More detailed information is contained in Laboratory Notebook 2446.

TABLE II

RADIATION SURVEY OF NIAGARA PLANT
Ludlum Model 19 - Micro R Meter

<u>Date</u>	<u>Buildings</u>	<u>Background</u>	<u>Comments</u>
2/12/86	29, 30, 77 (Fce. Rm #6)	5-10 μ R/hr	Area next to Fce 30 above background
2/14/86	25, 71, (UCAR, GLOBAR)	8-10 μ R/hr	Some sample cans >1mR/hr. OK
	32 (#2 Packing)	8-10 μ R/hr	
2/14/86	89, 89A (#10 Packing)	8-10 μ R/hr.	OK
2/18/86	24, 87 (Vanadium Aluminum)	8-13 μ R/hr	Area below Dust Coll above background.
2/20/86	(Storage Shed N W. Corner of Umetco Property)	8-12 μ R/hr.	OK
2/25/86	7 (Storeroom)	8-10 μ R/hr.	OK
2/25/86	6 (Maintenance Office, Electrical & Carpenter Shops)	8-10 μ R/hr.	OK
2/25/86	82, 82A (Machine Shop, Sheet Metal)	8-10 μ R/hr	OK
2/27/86	13, 14 (Aux Storeroom, Drum Shop, #8 Packing)	10-12 μ R/hr	OK
3/14/86	111 (Eng. Annex-Works Lab)	15-17 μ R/hr.	OK
3/14/86	3 (Compressor Bldg)	7-8 μ R/hr.	OK

The plan for decontamination that I reviewed with you was as follows:

1. Remove and store the contaminated material in suitable containers
2. Sample the areas, (either soil or surface wipes depending on which applies) and submit them to a qualified laboratory to identify the sources of the radiation and to confirm the radioactivity has been lowered to acceptable levels.
3. Transport the contaminated material together with the radioactive samples from Building 25 to an approved burial site under the supervision of a qualified broker.
4. Provide the Department of Labor with the analytical results and documentation that the material has been removed from the site and has been accepted for burial.
5. Make arrangements for the Department of Labor to obtain samples to verify that the decontamination was satisfactory.

At the time of your visit we had begun to cleanup the area in the vicinity of Furnace No 30 (contaminated slag and soil were being placed into 55-gallon drums). This has been completed and we are now working on cleaning up the area in Building 24

I would like to draw to your attention that the last amendment to License 950-0139 that I have on record is listed as No. 9, dated March 1979, expiration date November 1981. However, I have a copy of a letter dated November 17, 1984 which requests transfer of License 950-0139 from Union Carbide to Umetco Minerals addressed to Mr. George Kasyk of the New York Department of Labor. I expect that with our continuing efforts to terminate the license, issuance of the amendments is not a high priority

If you need more information please contact me. If I do not hear from you I will proceed according to the plan outlined above

Very truly yours,


D. J. Hansen

mau/349h

cc: Messrs
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